

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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January 7, 2022

**VIA ECF**

Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Centre Street  
New York, NY 10007

**Re: United States v. Michael Hagood  
20 Cr. 656 (PAE)**

Dear Judge Engelmayer,

I write to respectfully request a modification of one of Mr. Hagood's current bail conditions: specifically, to change home incarceration enforced by GPS to home detention enforced by GPS. The parties appeared before Your Honor on December 15, 2021 for a bail hearing at which time the Court imposed home incarceration (to replace home detention with a 4-hour window to leave the house each day). See Order at Dkt. No. 66. At that same hearing, counsel informed the Court that Mr. Hagood was re-enrolling as the home health aide for his uncle, with whom he resides. As such, the Court granted permission for Mr. Hagood to accompany his uncle to medical appointments with advance permission from Pretrial. See id.

Since then, Mr. Hagood has secured his home health aide employment through HouseCalls Home Care, a licensed home care agency. With the Court's permission, he attended orientation last week, and was given a list of "care duties," which he provided to counsel and Pretrial Services. That list includes doing the patient's laundry and food shopping. Mr. Hagood remotely "clocks" into his job at 7 am and out at 12 noon, Monday - Friday. Mr. Hagood and his uncle live alone in their apartment.

Given this new employment, Pretrial Services by Ashley Cosme reached out to undersigned counsel to say that home detention was a better fit for Mr. Hagood. On home detention – unlike home incarceration – Pretrial can approve a weekly schedule for laundry and shopping. This amendment would enable him to remain employed, while maintaining stricter conditions than those that existed prior to the December hearing.

The government by A.U.S.A. Mitzi Steiner takes no position on this request.


Thank you for your consideration.

Respectfully submitted,  
/s/  
Sylvie Levine  
Attorney for Mr. Hagood  
917-612-4527

**GRANTED.** The Clerk of Court is requested  
to terminate the motion at Dkt. No. 69.

SO ORDERED.

1/7/2022

  
PAUL A. ENGELMAYER  
United States District Judge